

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATE OF AMERICA,)	
)	
Plaintiff,)	No. 18 CR 789
)	
vs.)	Hon. Gary Feinerman
)	
DENY MITROVICH)	
)	
Defendant.)	

MOTION FOR PERMISSION TO APPEAL *IN FORMA PAUPERIS*

NOW COMES, the defendant, Deny Mitrovich, by and through his undersigned counsel, and moves this Honorable Court for permission to appeal *in forma pauperis*. In support, Mr. Mitrovich offers the following:

1. Mr. Mitrovich initially retained attorney Barry Lewis to represent him in this case before the District Court for the Northern District of Illinois.
2. As this case progressed, Mr. Mitrovich has undergone significant financial hardship. He and his wife separated, leaving him with financial responsibilities to his former spouse. Mr. Mitrovich also has an infant child, and he has been providing financial support. Moreover, his father passed away during this time. His father ran a small business and took care of Mr. Mitrovich's mother who is elderly and suffers from several medical conditions. After his father passed, Mr. Mitrovich became one of his mother's biggest supporters.

3. On December 19, 2022, the District Court sentenced Mr. Mitrovich to 84 months imprisonment on Count One of the Indictment. Doc. #152. The District Court entered a judgement and Commitment Order that day.

4. Mr. Mitrovich intends to appeal certain rulings made by the District Court and the District Court's sentence. He does not have, however, the necessary funds to retain private counsel to prosecute his appeal given his lack of income for the foreseeable future and financial responsibilities.

5. Because Mr. Mitrovich is financially unable to retain counsel of his choice, he must proceed *in forma pauperis*.

6. The affidavit accompanying this motion sets out facts verifying Mr. Mitrovich's financial status and his inability to retain counsel. *See attached Exhibit*.

7. Because of the undersigned's familiarity with both the underlying facts of the instant case, the familiarity with Mr. Mitrovich, and for continuity of counsel, the undersigned respectfully requests that this Honorable Court appoint the undersigned, pursuant to the Criminal Justice Act, as appellate counsel for Mr. Mitrovich.

WHEREFORE, defendant, DENY MITROVICH, prays this Honorable Court grants him leave to appeal his case to the Seventh Circuit *in forma pauperis*.

Respectfully submitted,

s/ Vadim A. Glozman
Attorney for Deny Mitrovich

Vadim A. Glozman
Matthew P. Kralovec
LAW OFFICES OF VADIM A. GLOZMAN
53 W. Jackson Blvd., Suite 1128
Chicago, IL 60604
(312) 726-9015

CERTIFICATE OF SERVICE

I, Vadim A. Glozman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 2nd day of January, 2022, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s Vadim A. Glozman

LAW OFFICES OF VADIM A. GLOZMAN
53 W. Jackson Blvd., Suite 1410
Chicago, IL 60604
(312) 726-9015